

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

<b>IN RE: BOSTON SCIENTIFIC CORP., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02326 MDL No. 2326</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>

**CROSS-NOTICE OF VIDEOTAPED DEPOSITION  
OF DAN BURRILL AND SUBPOENA DUCES TECUM**

**PLEASE TAKE NOTICE** that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Plaintiff shall take the discovery deposition upon oral examination of Dan Burrill on April 27, 2017, at 9:30 a.m. at the DoubleTree, 5400 Computer Drive, Westborough, MA 01581, at which time and place you may participate.

The deposition shall be recorded by stenographic means before a person duly authorized to administer oaths and will be videotaped. The deposition is scheduled to continue from day to day until completed.

**PLEASE TAKE FURTHER NOTICE** that, in connection with the taking of the deposition, the deponent shall produce the items described on Exhibit A attached. This deposition is cross-noticed in the above-captioned matter pursuant to Federal Rules of Civil Procedure.

Respectfully submitted,

**THE MOSTYN LAW FIRM**

/s/ Mark Sparks

Mark Sparks

State Bar No. 24000273

6280 Delaware Street

Beaumont, Texas 77706

(409) 832-2777 (Office)

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**ATTORNEYS FOR PLAINTIFFS**

**EXHIBIT “A”**

The deponent is required to bring to the Deposition the following described documents and things:

1. A current Curriculum Vitae and/or resume.
2. Any and all materials and documents which were reviewed by or with the witness in anticipation of, or in preparation for this deposition.
3. Any and all records, documents and writings and other documentation which were provided to, reviewed or intended to be reviewed by, considered by or intended to be considered by and/or relied or intended to be relied upon by the witness in preparation for this deposition.
4. Any and all depositions, testimony or transcripts, statements (written, recorded or otherwise), newspaper articles, journal articles, or any other documents or writings which were provided to, reviewed or intended to be reviewed by, considered by or intended to be considered by and/or relied or intended to be relied upon by the witness in formation of any opinions or foundation of any testimony in this case.
5. Any and all files, charts, records and/or other documents reviewed and considered by the witness in formation of any opinions or foundation of any testimony in this case.
6. If any of the above-items, as described in Nos. 1-5, are unavailable at the time and place of this deposition, the witness is requested to identify where such items are located, who has possession of them, and how they may be obtained through the formal processes of the Court.

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**CERTIFICATE OF SERVICE**

I hereby certify that on March 2, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

Respectfully submitted,

**THE MOSTYN LAW FIRM**

/s/ Mark Sparks

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